

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 21 CR 316
)	
vs.)	Judge Andrea R. Wood
)	
MATTHEW SCHWARTZ)	

**DEFENDANT'S UNOPPOSED MOTION
TO FILE DOCUMENT 92 UNDER SEAL**

Now Comes MATTHEW SCHWARTZ, by and through his attorney,
Sheppard Law Firm, P.C. and moves, unopposed, to file Document 92, an exhibit to
Defendant's Position Paper as to Sentencing Factors, under seal. In support thereof,
defendant states as follows:

1. Document 92 consists of a photograph of a person whom the government refers to in its pleadings as Minor A and may depict Minor A at a time when she was a minor.
2. Out of privacy concerns for Minor A (who is now an adult), defense counsel consulted the government regarding filing that exhibit under seal and there was no objection.

WHEREFORE, defendant moves for leave to file document 92 under seal.

Respectfully submitted:

/s/ Adam Sheppard
An Attorney for Defendant

/s/ Barry Sheppard
An Attorney for Defendant

Sheppard Law Firm, P.C.
180 N. LaSalle Street, Suite 2510
Chicago, Illinois 60601
(312) 443-1233
Adam Sheppard IL Bar no. 6287375
Barry Sheppard IL Bar no. 2579901

CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was filed on December 7, 2022, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Adam Sheppard
Attorney for Defendant

Adam Sheppard
180 North LaSalle Street, Suite 2510
Chicago, Illinois 60601
(312) 443-1233
adam@sheppardlaw.com
IL Bar. No. 6287375